

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

	)	MDL Docket No. 1:10-md-2197-DAK
IN RE: DEPUY ORTHOPAEDICS,	)	
INC. ASR HIP IMPLANT	)	HONORABLE DAVID A. KATZ
PRODUCTS LIABILITY	)	
LITIGATION	)	
	)	
-----	)	
THIS DOCUMENT APPLIES TO:	)	
ALL CASES	)	

**NOTICE OF ORAL AND VIDEO DEPOSITION OF  
DEPUY ORTHOPAEDICS, INC., PURSUANT TO FED. R. CIV. P. 30(b)(6)  
(Electronically Stored Information)**

TO: Robert C. Tucker, Esq.  
TUCKER ELLIS & WEST LLP  
1150 Huntington Building  
925 Euclid Avenue  
Cleveland, OH 44115

Susan M. Sharko, Esq.  
DRINKER BIDDLE & REATH LLP  
500 Campus Drive  
Florham Park, NJ 07932-1047

*Attorneys for Defendant DePuy Orthopaedics, Inc.*

PLEASE TAKE NOTICE that pursuant to Rule 26 and Rule 30(b)(6) of the Federal Rules of Civil Procedure, plaintiffs, by and through their undersigned attorneys, the Plaintiffs Steering Committee in the above-captioned Multidistrict Litigation, will take the deposition of DePuy Orthopaedics, Inc. on Tuesday, April 27, 2011, at 9:00 a.m., or such other time as is agreed upon by the parties, at the offices of the Hyatt Place Indianapolis Airport, 5500 W. Bradbury Avenue, Indianapolis, Indiana 46241, or at another location mutually agreed upon by the parties. Pursuant to Fed. R. Civ. P. 30(b)(6), DePuy Orthopaedics, Inc. shall designate and

produce a representative or representatives, as may be required, to testify on behalf of DePuy Orthopaedics, Inc. concerning the topics identified in Exhibit A attached hereto.

The deposition shall be recorded by stenographic and audiovisual means and taken before a person authorized by law to administer oaths, pursuant to Fed. R. Civ. P. 28, and will continue from day-to-day, excluding Sundays and court-recognized holidays, until the examination is completed.

Dated: March 25, 2011

Respectfully submitted,

ZOLL, KRANZ & BORGESS, LLC,

By: /s/ Michelle L. Kranz  
Michelle L. Kranz (0062479)  
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*Plaintiffs' Liaison Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 25, 2011, a copy of the above and foregoing NOTICE OF ORAL AND VIDEO DEPOSITION OF DEPUY ORTHOPAEDICS, INC., PURSUANT TO FED. R. CIV. P. 30(b)(6), and the Exhibit hereto, was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system. It has also been served by U.S. Mail and e-mail on the counsel listed below:

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Dated: March 25, 2011

/s/ Michelle L. Kranz

*Plaintiffs' Liaison Counsel*